

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

COLLEEN O'DONNELL,)
)
Plaintiff,) Civil Action No: 04-40190-FDS
v.)
)
ALBERTO R. GONZALES, ATTORNEY)
GENERAL, U.S. DEPARTMENT)
OF JUSTICE,)
)
Defendant.)

MOTION TO FILE DOCUMENTS UNDER SEAL (ASSENTED TO)

Pursuant to Rule 26(c)(8), Defendant, Alberto R. Gonzales, the Attorney General for the United States of America, by his attorney, Michael J. Sullivan, the United States Attorney for the District of Massachusetts, hereby requests permission to file under seal documents previously designated by the parties as "CONFIDENTIAL" pursuant to the Court's August 22, 2005 protective order. Good cause exists for granting the United States's request.

Many, if not all, of the documents designated by the parties as "CONFIDENTIAL" contain highly personal and/or medical information concerning the Plaintiff and a potential witness that should not be made available to the public. It is necessary, however, for the United States to use some of these "CONFIDENTIAL" documents as exhibits to its Motion for Summary Judgment. So that these "CONFIDENTIAL" documents are not made available to the public once the government files its motion with the Court -- or, assuming Plaintiff uses "CONFIDENTIAL" documents as exhibits to her opposition, when the Plaintiff files her

opposition -- the government requests permission for the parties to file the "CONFIDENTIAL" documents separately with the Court under seal.

Counsel for the Plaintiff assents to this motion.

Dated: March 15, 2006

ALBERTO R. GONZALES,
Attorney General, U.S.
Department of Justice

By his attorney,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Damian W. Wilmot
Damian W. Wilmot
Assistant U.S. Attorney
1 Courthouse Way
Boston, MA 02210
(617) 748-3398

CERTIFICATION UNDER L.R. 7.1

I certify that in accordance with Local Rule 7.1, on March 15, 2006, I have conferred with Plaintiff's counsel and she assents to the above motion.

/s/ Damian W. Wilmot
DAMIAN W. WILMOT
Assistant U.S. Attorney